## UNITED STATES BANKRUPTCY COURT DISTRICT OF MARYLAND BALTIMORE

N RE:	BCN#:	18-20102

RACHEL H. PALMER Chapter 13

Debtor

WELLS FARGO BANK, NATIONAL ASSOCIATION, SUCCESSOR BY MERGER TO WELLS FARGO BANK MINNESOTA, NATIONAL ASSOCIATION, AS TRUSTEE FOR REPERFORMING LOAN REMIC TRUST CERTIFICATES, SERIES 2003-R1 and its assignees and/or successors in interest.

**NOTICE OF DEFAULT** 

Movant/Secured Creditor

٧.

RACHEL H. PALMER

Debtor Respondents

I, the undersigned attorney and Agent for WELLS FARGO BANK, NATIONAL ASSOCIATION, SUCCESSOR BY MERGER TO WELLS FARGO BANK MINNESOTA, NATIONAL ASSOCIATION, AS TRUSTEE FOR REPERFORMING LOAN REMIC TRUST CERTIFICATES, SERIES 2003-R1, hereby certify, to the best of my knowledge, information, and belief, that the following is true and correct;

- 1. On March 16, 2020 this Court entered an Order in the above-styled case providing that the debtor was to have cured all post-petition arrearages. The Order also states that in the event that the Debtor should fail to make the payments by the dates in accordance with the terms of said order, by the dates indicated or if the Debtor should default in making future monthly, post-petition payments, the movant may file with this Court and mail to all interested parties, a notice describing the alleged default.
- 2. As April 10, 2020, the Movant has not received the post-petition payments that were due as follows:

March 1, 2020 to April 1, 2020 regular monthly payment at \$553.54:
March 15, 2020 regular monthly stip payment at

\$1.107.08

\$446.91

\$446.91: Suspense/Unapplied Balance BK Attorney Fees

\$(446.91) \$100.00

- 3. The present amount necessary to cure this default is \$1,207.08 through April 10, 2020.
- 4. This Notice Of Default is being filed in accord with the Court Order of March 16, 2020, the Order stipulating that the default must be cured within 12 days of the mailing of this notice, or that a response must be filed to said notice denying the default and requesting a hearing.

SHAPIRO & BROWN, LLP Attorney for Movant

By: /s/ Malcolm B. Savage, III William M. Savage, Esquire Federal I.D. Bar No. 06335 Kristine D. Brown, Esquire Federal I.D. Bar No. 14961 Zohaib Ahmed, Esquire Federal I.D. Bar No. 21167 Kimberly F. Outlaw, Esquire Federal I.D. Bar No. 21186 Gregory N. Britto, Esquire Federal I.D. Bar No. 22531 Malcolm B. Savage, III, Esquire Federal I.D. Bar No. 20300 SHAPIRO & BROWN, LLP Shapiro & Brown, LLP 10021 Balls Ford Road, Suite 200 Manassas, Virginia 20109 (703) 449-5800 ecf@logs.com

## CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of April, 2020, the following person(s) were served a copy of the foregoing Notice in the manner described below:

Via CM/ECF Electronic Notice

KIM D. PARKER 2123 MARYLAND AVENUE BALTIMORE, MD 21218 Debtor's Attorney

Robert S. Thomas, II 300 E Joppa Road, Suite 409 Towson, MD 21286 Chapter 13 Trustee

Via First Class Mail, Postage Prepaid:

Rachel H Palmer 11 S. Rosedale Street Baltimore, MD 21229 Debtor(s)

/s/ Malcolm B. Savage, III William M. Savage, Esquire Federal I.D. Bar No. 06335 Kristine D. Brown, Esquire Federal I.D. Bar No. 14961 Zohaib Ahmed, Esquire Federal I.D. Bar No. 21167 Kimberly F. Outlaw, Esquire Federal I.D. Bar No. 21186 Gregory N. Britto, Esquire Federal I.D. Bar No. 22531 Malcolm B. Savage, III, Esquire Federal I.D. Bar No. 20300 SHAPIRO & BROWN, LLP 10021 Balls Ford Road, Suite 200 Manassas, VA 20109 (703) 449-5800 17-271146